

**DISCUSSION RELATED TO FEDERAL REGISTER ANNOUNCEMENT
VOL. 67, NO. 131
JULY 9, 2002**

Dear Mr. Connaughton:

This is in reply to the general questions relative to improving the application of NEPA to environmental stewardship.

I am a GS-13 Bridge Management Specialist working in the office of Bridge Administration, U.S. Coast Guard. My academic qualifications, stated only for credibility purposes, include a Ph.D. in Educational Psychology with a specialty in research statistics.

The Bridge Permits Division, where I work, is responsible for issuing nationwide permits to build, modify or repair bridges across navigable waters of the United States. Said permits require the applicants to fully comply with NEPA regulations.

The purpose of this response is to give you some basic data results that may help in evaluating the effectiveness of applying NEPA. Secondly, I will address only a couple specific questions stated in the aforementioned Federal Register announcement.

I recently analyzed 500 bridge permit cases dating from 4th quarter of FY93 through 3rd quarter of FY02. These cases cover the gamut of environmental documentation.

The average processing times should interest you. These are the times from receipt of completed application for bridge permit until the permit is issued. Most of the in-between time is used complying with NEPA regulations.

The results are:

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Categorical Exclusions = 9.8 months; N = 232

EA/FONSI = 9.3 months; N = 72

EIS/FEIS = 10.6 months; N = 63

FONSI = 10.2 months; N = 133

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Analyzing the data distributions for each type of case using the t Test, shows no significant processing time differences. In my opinion, significant differences *should exist* if the NEPA process is being applied consistently and logically.

One would expect a significantly shorter time for a Categorical Exclusion than for an EIS. The sequence of increasing processing times should be: CE < FONSI < EA/FONSI < EIS.

Therefore, I suggest that you look for advice on streamlining/compressing the NEPA process, since the processing times for our agency are probably typical for other agencies.

The above result partially answers question E.3 regarding whether improvements are needed in the CE process specifically. The answer is yes. A CE should not take the same time as an EIS to process.

Determining specific actions to implement under each of the general questions A through F to streamline the NEPA process is difficult. This difficulty is undoubtedly related to, although not totally dependent upon, the diversity of agencies – and their separate political agendas – that must interact/cooperate by the very structure of the NEPA regulations.

For example, of the 500 Coast Guard bridge cases referenced here, the Coast Guard was the lead agency on 31 percent, while the Federal Highway Administration was lead on 63 percent. The remaining cases involved Department of State, Bureau of Reclamation, Navy, Federal Transportation Administration and the U. S. Army Corps of Engineers.

Even though inter-agency memoranda of agreement may exist, case processing is obviously slowed by having more “fingers in the pie,” plus separate interpretations of what is “correct.”

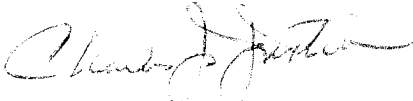
Certainly question E needs researching in light of the above results. Regarding question A.3, I use Microsoft Excel for all data needs of my Division. Its main advantage is that it is very easy to learn and contains sufficient statistical tests to analyze virtually any type of environmental data. Its main drawback is that it cannot handle really large databases, say from 10,000 through millions of cases. For those processing needs, I would recommend SPSS. It is used in some offices of Department of Transportation such as that of the Inspector General.

Definitely, a concerted effort must be made to standardize the definitions inherent in each type of environmental case documentation and how each interacting agency approaches related case analyses. It is likely that paperwork can be halved if proper attention is made to eliminating redundancy and in “de-Dilbertizing” the NEPA system wherever possible.

Thank you for your time in reading this. I hope my input is useful.

Respectfully Yours,

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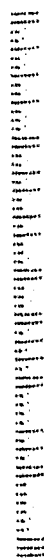
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